

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAPHNE MOORE,
Defendant

Crim. No. 3:18-CR-30001-WGY

ASSENTED-TO MOTION FOR PERMISSION TO TRAVEL

Now comes the Defendant in the above-captioned matter and, with the Government's assent, seeks this Court's permission to travel to South Carolina as early as Friday, November 3, 2023 in order to visit an aunt who is close to death and to return following her aunt's funeral.

As grounds therefore, the Defendant asserts the following:

1. Alma Jenkins is one Daphne Moore's aunts. Ms. Jenkins resides in Myrtle Beach, South Carolina.
2. Ms. Moore has been informed that Ms. Jenkins is not expected to survive another week.
3. Family members have begun to travel to South Carolina.
4. Ms. Moore would like to travel there to try to see her aunt before she passes. She would also like to remain in South Carolina until and through her funeral. She would return to Massachusetts within three days of the funeral.
5. Ms. Moore has sought and obtained permission to travel out of state many times in the five years this case has been pending. There has never been a problem with her out-of-state travel

6. Undersigned counsel contacted AUSA Catherine Curley, who is prosecuting the case, and AUSA Curley replied that she assents to the travel request.

Respectfully Submitted,

DAPHNE MOORE

By her attorney,

/s/Paul Rudof

Paul Rudof

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Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 2, 2023.

/s/Paul Rudof